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**From:** Mumley, Thomas@Waterboards [Thomas.Mumley@waterboards.ca.gov]  
**Sent:** 3/28/2019 4:44:40 PM  
**To:** Smith, DavidW [Smith.DavidW@epa.gov]; Purdy, Renee@Waterboards [Renee.Purdy@waterboards.ca.gov]  
**Subject:** RE: Reactions to new CA MS4 cost estimation guidance docs?

They are both good starting points for what we need or may need. We purposefully kept them simple to start, mainly to minimize our short-term effort to meet the State Auditor recommendations for them, which were unrealistically due for completion by August 2018. By design, they are living documents that will be adaptively improved based on feedback from stakeholders, particularly municipalities, and ground truthing them through use. We recently contacted CASQA to engage them. I have historical and lingering concerns that cost-reporting has minimal or questionable value until we have a clear plan and expectations for using reported cost data. We know most municipalities have grossly underfunded programs. That said, the time has come to establish meaningful maximum extent practicable performance metrics for mandatory minimum measures.

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**From:** Smith, DavidW <Smith.DavidW@epa.gov>  
**Sent:** Thursday, March 28, 2019 9:13 AM  
**To:** Purdy, Renee@Waterboards <Renee.Purdy@waterboards.ca.gov>; Mumley, Thomas@Waterboards <Thomas.Mumley@waterboards.ca.gov>  
**Subject:** Reactions to new CA MS4 cost estimation guidance docs?

These are on the agenda for today's SW Roundtable for discussion. Im going to try to sit in but am double booked. Will be interested to hear your reactions. Do you think they provide the kind of cost estimation guidance we all need?

Thanks

Dave

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